

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Jeremias Olivo	:	
<u>Debtor</u>	:	
	:	CHAPTER 13
Freedom Mortgage Corporation	:	
	:	
<u>Movant</u>	:	Case No. 19-16337-AMC
v.	:	Hearing Date: 05-11-2021 at 11:00 am
	:	
Jeremias Olivo	:	11 U.S.C. 362
<u>Respondent</u>	:	
	:	
William C. Miller, Esq.	:	
<u>Trustee</u>	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

And now Jeremias Olivo, by his attorney, Stephen M. Dunne, Esquire answers the request for relief from the automatic stay and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. Admitted.
6. Admitted.
7. Denied.
8. Denied.
9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. Denied.

WHEREFORE, debtor requests that the motion for relief from the automatic stay be denied.

Respectfully submitted,

Stephen M. Dunne, Esquire
/s/ Stephen M. Dunne
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